



EU-US PRIVACY SHIELD AND US-SWISS PRIVACY SHIELD POLICY

Mind Your Business, Inc. is a US company and leading provider of background investigations, EEO investigations and drug screening services. Our employment screening system makes us a business to business (B2B) provider servicing a variety of government agencies, non-profit and for-profit entities across the spectrum.

PARENT, SUBSIDIARY, OR AFFILIATE COMPANIES

Mind Your Business has no parent, subsidiary, or affiliate companies that are covered by this EU-US Privacy Shield and US-Swiss Privacy Shield Policy.

AFFIRMATION OF EU-U.S. PRIVACY SHIELD POLICY

Mind Your Business, Inc. complies with the *EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework(s)* (Privacy Shield) as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the *European Union and the United Kingdom and/or Switzerland*, to the United States in reliance on Privacy Shield. *Mind Your Business, Inc.* has certified to the Department of Commerce that it adheres to the Privacy Shield Principles with respect to such information. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>

TYPES OF, AND PURPOSE FOR, DATA COLLECTED

Mind Your Business gathers personal information regarding individuals, who have unambiguously consented to in writing, on behalf of its clients by manually or electronically contacting the appropriate sources of the data (court records, references, licensing bureaus, etc.), including but not limited to:

- (1) criminal history at the federal, state, and local levels;
- (2) verification of credentials, including education and licensure;
- (3) state motor vehicle records abstracts;

- (4) consumer credit reports;
- (5) verification of present and past employment;
- (6) personal and professional references;
- (7) national and international sanctions and exclusions database checks;
- (8) sex offender registry checks; and,
- (9) drug and occupational health screening.

Mind Your Business collects and uses personal information to prepare and provide background checks reports to employers or their agents (such as recruiters or staffing firms) for use in making employment-related decisions, such as who to hire, retain, promote, or re-assign. These reports may at times be use for:

- (1) investigation into a suspicion of work-related misconduct or wrongdoing;
- (2) investigation into matters of employee compliance with employer policies; or,
- (3) investigation into matters of employee compliance with federal, state, or local laws and regulations.

TYPES OF THIRD PARTIES TO WHICH PERSONAL INFORMATION IS DISCLOSED AND PURPOSE FOR SUCH DISCLOSURE

Mind Your Business transfers data to third parties such as: public record researchers, vendors and state regulated agencies. Mind Your Business transfers data to these organizations to verify; employment, education, court records and credit bureaus to name a few. All companies we partner with go through a rigorous vetting process and are tested to ensure quality.

RIGHT OF INDIVIDUALS TO ACCESS THEIR OWN PERSONAL INFORMATION FOR CORRECTION, AMENDMENT, OR DELETION

Mind Your Business acknowledges that individuals have the right to access their personal information. An individual may request, in writing, access to all personal information collected and maintained about him or her by Mind Your Business. Upon receipt of such request, Mind Your Business will provide all such information in a manner and form that maintains the security and confidentiality of the information. Mind Your Business affords the individual a reasonable opportunity to correct, amend, or delete information that is inaccurate or incomplete, except where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy, or where the rights of persons other than the individual would be violated. In cases where the information is subject to the Fair Credit Reporting Act ("FCRA"), Mind Your Business complies with the FCRA's requirements regarding access and correction rights of consumers. To request information relating to his or her personal information, the party may contact Mind Your Business by e-mail at the following email address, lharrell@mybinc.com, or by fax at 1-828-698-9918. In addition, the individual will be asked to provide enough evidence of his or her identity, so we may ensure that information is being released only to the subject of the data. If we are unable to provide the individual with access to his or her personal information or to correct the data, we will notify the individual and provide all relevant details and circumstances preventing Mind Your Business from doing so. Note that

depending on our contractual obligations with our client, for whom we procure the information, we may have to refer access inquiries to that specific entity.

LIMITING USE AND DISCLOSURE OF PERSONAL INFORMATION

Although Mind Your Business obtains an individual's unambiguous consent in writing to its gathering and disclosure of personal information, and because of Mind Your Business's commitment to afford individuals every possible protection, if you would like to opt-out from Mind Your Business using your personal information, send an email to lharrell@mybinc.com, or call 1-828-698-9905. If opting-out by email or telephone, please provide us with: (1) your complete legal name; (2) month and year of birth; and, (3) the name of the Mind Your Business client with whom you have applied for a position.

INDEPENDENT DISPUTE RESOLUTION MECHANISM

In compliance with the Privacy Shield Principles, Mind Your Business commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to Privacy Shield. European Union, **the United Kingdom** and Swiss individuals with Privacy Shield inquiries or complaints should first contact Mind Your Business at:

Mind Your Business, Inc.
Attn: Lauren Harrell
500 Beverly Hanks Center
Hendersonville, NC 28792
1-828-698-9906
lharrell@mybinc.com

Mind Your Business has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the BBB National Programs, Inc. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit www.bbb.org/EU-privacy-shield/for-eu-consumers/ for more information and to file a complaint. This service is provided free of charge to you.

If your Privacy Shield complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See Privacy Shield Annex 1 at <https://privacyshield.gov/article?id=ANNEX-I-introduction> (<https://privacyshield.gov/article?id=ANNEX-I-introduction>)

INVESTIGATORY AND ENFORCEMENT AGENCIES

Mind Your Business is subject to the investigatory and enforcement powers of the Federal Trade Commission ("FTC") and the Consumer Financial Protection Bureau ("CFPB").

DISCLOSURE OF PERSONAL INFORMATION PURSUANT TO LAWFUL REQUEST

Mind Your Business may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

ONWARD TRANSFER OF PERSONAL INFORMATION TO THIRD PARTIES

In the context of an onward transfer, Mind Your Business has responsibility for the processing of personal information it receives under the Privacy Shield and subsequently transfers to a third party acting as an agent on its behalf. Pursuant to the Privacy Shield, Mind Your Business, Inc. remains liable for the transfer of personal data to third parties acting as our agents unless we can prove we were not a party to the events giving rise to the damages.

HUMAN RESOURCES DATA WITHIN THE CONTEXT OF THE EMPLOYMENT RELATIONSHIP

If your complaint involves human resources data transferred to the United States from the EU, **the United Kingdom** and/or Switzerland in the context of the employment relationship, and Mind Your Business does not address it satisfactorily, Mind Your Business commits to cooperate with the panel established by the EU data protection authorities (DPA Panel) (and/or the Swiss Federal Data Protection and Information Commissioner, as applicable) and comply with the advice given by the DPA Panel (and/or Commissioner, as applicable) with regard to such human resources data. To pursue an unresolved human resources complaint, you should contact the state or national data protection or labor authority in the appropriate jurisdiction. Complaints related to human resources data should not be addressed to the BBB EU PRIVACY SHIELD,

Contact details for the EU data protection authorities and Swiss FDPIC can be found at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm
<https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/links/data-protection---switzerland.html>

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